

CC Docket No. 94-102 – Status Report

Filed by: Keystone Wireless, L.L.C.
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Date: May 25, 2007

To: Marlene H. Dortch, Secretary
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By Electronic Submission:

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STATUS REPORT
May, 2007
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Keystone Wireless, L.L.C. ("Keystone") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, Order, 20 FCC Rcd 16927 ¶19 (2005).

Carrier Identifying Information:

Carrier Name: Keystone Wireless, L.L.C. – FRN 0007 4157 06

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Timeliness:

Keystone did not submit this quarterly status report on May 1, 2007, because Keystone expects to receive notice from the State of Pennsylvania regarding Keystone's Phase I and Phase II E-911 funding requests on June 1, 2007, and intended to file this status report after receipt of said notice. However, Keystone is prompted by an inquiry from Commission staff regarding the status of this report to submit the report at this time, rather than wait until June. Keystone will report on the state's funding decision in its next quarterly status report.

Information Regarding PSAPs:

Since the submission of its last Status Report, Keystone has received no new Phase I or Phase II E-911 requests from any PSAP in its market. To date, Keystone has received a total of seven Phase I requests and eight Phase II requests. Keystone has completed the installation of its Phase I deployments in Berks County, Centre County, Lycoming County, Schuylkill County, Montour County, Clinton County, and Northumberland County. Keystone and the PSAP for Snyder County have scheduled the deployment of Phase I in that county to begin at the end of June, 2007. Upon completion of installment of Phase I in Snyder County, Keystone will be Phase I compliant in all eight counties from which it has received PSAP requests.

As previously reported, Keystone has engaged Essential Management Services, LLC ("EMS") to assist it in securing funding from the State of Pennsylvania, and to interface with the various PSAP's and keep them informed of Keystone's activities regarding state funding and its implementation plans for Phase II E-911. Keystone and EMS are maintaining regular contact with the PSAPs and ensuring that they are provided with copies of all related submissions to the

Federal Communications Commission. Among other things, EMS attends a monthly Public Safety Regional Meetings where it can discuss E-911 matters with the PSAPs on behalf of Keystone. To date, all concerns or issues expressed by the PSAPs with respect to Keystone's Phase II E-911 implementation efforts have been conveyed and accepted. Likewise, the Pennsylvania Emergency Management Agency ("PEMA"), which is the agency responsible for overseeing Phase I and Phase II E-911 deployment by all state PSAPs, has not expressed any concerns or issues respecting Keystone's deployment of Phase II E-911.

On March 2, 2007, Pursuant to the Pennsylvania State regulation and the Statewide Wireless E9-1-1 Plan, Keystone provided PEMA with a Wireless 9-1-1 Cost Recovery Plan ("CRP") for consideration and approval. The CRP Includes a total cost recovery for the provision of wireless E9-1-1 service (Phase I and II) in all areas of Pennsylvania that Keystone is authorized and licensed to serve, regardless of whether a Phase I/II request has been received. In addition to the CRP, in order to be eligible for reimbursement and/or funding, Keystone provided a deployment status survey that indicates its Phase I and II deployment status in every county in which it provides service along with specific description and detail breakdown of all actual and estimated costs to implement and maintain both Phase I and Phase II E-9-1-1 wireless service. The CRP is currently under review by PEMA. Upon its approval, Keystone will provide a status report to each of the PSAPs in Keystone's service area.

Implementation of Phase II Service:

Keystone continues to explore various Phase II E-911 network-based solutions and to monitor the market for new products or modifications to existing products that might potentially serve as a viable and affordable Phase II solution for Keystone's market. Keystone also continues to watch for any news of any manufacturer developing a GSM E-911 handset. As previously advised, Keystone cannot implement any known Phase II E-911 solution until it is able to secure financing. Once Keystone has secured funding for Phase II E-911 from the State of Pennsylvania or other sources, Keystone will immediately move forward with Phase II deployment plans.

EMS is providing Keystone with periodic reports on its efforts to assist Keystone in effectuating the Phase I cost recovery process with the PEMA, and in obtaining funding from the PEMA for Phase II E-911 deployment. Keystone, through EMS, submitted its requisite funding applications to the PEMA in March of this year, during the annual Pennsylvania filing window. Under Pennsylvania law, the PEMA is required to notify Keystone by June 1, 2007, whether Keystone is eligible for funding and the amount of any funds to be distributed to Keystone for (i) reimbursement of its Phase I deployment costs and/or (ii) funding for its Phase II deployment.

The PEMA has a limited amount of funds to distribute annually among both PSAPs and carriers in the state who are seeking funding for Phase I and Phase II E-911 deployment. Each year, these limited funds are distributed in the following order of priority until expended: First, to PSAPs for Phase I; second, to carriers for Phase I; third, to PSAPs for Phase II; and fourth, to carriers for Phase II. Last year, the PEMA had sufficient funds to make a distribution to only one carrier after paying 72% of the eligible PSAP Phase I costs. This year only two carriers, including Keystone, have filed applications for E-911 funding. However, Keystone has been

advised that these funding requests, collectively, exceed the amount of funds available for distribution by the PEMA this year. Keystone anticipates that there will be sufficient funds to reimburse a portion, but not all, of Keystone's eligible Phase I E-911 costs, and none of Keystone's Phase II costs. Keystone will have to reapply next year (and possibly subsequent years) for reimbursement of any remaining Phase I costs and its eligible Phase II costs. Whatever funds the PEMA does decide to distribute to Keystone will be paid in four equal installments over the ensuing year. Keystone has continued to explore other financing options, but to date has not come up with another viable option.

Upon receipt of *any* funds from the PEMA, Keystone will enter into new negotiations with the three manufacturers of Phase II E-911 solutions that it previously dealt with, and will explore with them any new options they may have for network-based or hybrid Phase II E-911 solutions that would produce a better result in the areas of Keystone's market lacking adequate cell density. Keystone will then select the most viable and affordable Phase II E-911 solution and commence implementation of same. (In other words, if Keystone receives any significant reimbursement for the Phase I costs that Keystone incurred in the past, Keystone plans to use those funds to begin immediate implementation of Phase II.)

Because Keystone's service area encompasses only very rural or less densely populated areas and the cell sites are spread far apart, only a portion of Keystone's service area is susceptible to triangulation techniques. Thus, when Keystone implements one of the currently available network-based or hybrid Phase II E-911 solutions, which utilize triangulation techniques, it may not reach the requisite 67% and 95% accuracy requirements prescribed by §20.18(h)(1) or (2) of the Commission's rules. Therefore, even after purchasing and installing Phase II infrastructure, Keystone likely will have to file a request with the Commission for a waiver of these accuracy standards until such time as there are further technological advancements in this field allowing for full compliance with §20.18(h) of the rules.

Construction of New Cells and Expansion of Coverage:

Since its last Status Report, Keystone has constructed two new cell sites in its market, which give Keystone coverage of areas in which it previously had no coverage. Construction of these new cells has enhanced public safety by bringing Keystone's Phase I E-911 service to these newly-served areas.